

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, et al.,

Plaintiffs,

NEW YORK IMMIGRATION
COALITION, et al.,

Consolidated Plaintiffs

v.

UNITED STATES DEPARTMENT OF
COMMERCE, et al.,

Defendants.

Civil Action No. 1:18-cv-2921-JMF

SUPPLEMENTAL AFFIDAVIT OF JACQUELINE TIEMA-MASSIE

I, Jacqueline Tiema-Massie, pursuant to the provisions of 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct:

1. As explained in my October 23 Affidavit, I am the Director of Planning, Research and Development as well as the Director of Grants Management for the Chicago Department of Family and Support Services (“DFSS”), and my responsibilities include directing the preparation of complex state, local, and private human service grants worth over \$315 million annually. As part of my employment, I also supervise a team of grant project managers and planners that are responsible for the development and submission of DFSS’s 30 recurring grants; for identifying new funding sources to support DFSS programs and new initiatives; preparing key reports, plans, and assessments associated with DFSS grants; and for the project management of the Community Services Block Grant (“CSBG”) program.

2. All of the statements made in my October 23 Affidavit and in this Supplemental Affidavit are made based on my personal knowledge, acquired after nearly five years as Director of Planning, Research, and Development as well as Director of Grants Management for Chicago's DFSS. DFSS receives multiple federal and federal-state pass-through grants to support the City of Chicago's human services delivery system, and my team – and ultimately myself – are responsible for securing this funding.

3. Because of my professional position and experience, I have factual knowledge of how these formulas work in the City of Chicago as well as grants management expertise. During the last seven years of working in grants management capacities in City of Chicago agencies, I have observed how grant funding for these and other programs are administered from year to year. Based on my understanding and experience with the programs that allocate these grant funds and from observing how these federal and federal-pass through grants are administered, I understand that the programs described in this and my October 23 affidavit rely in part on population figures derived from census data.

4. In my grant management role with DFSS, my staff and I interact with delegate agencies that receive funding from federal and federal-state pass-through grants. Part of my job is understanding the services that delegate agencies provide to Chicago residents so we can develop human service grant proposals. I therefore am aware that delegate agencies rely heavily on government support to operate their programs, including their staff and operations, and that the communities in which these agencies are located would all be negatively impacted by a reduction in funding.

5. While I have been employed with DFSS, I have become familiar with the grant programs through which DFSS receives money, with the City of Chicago budget, and with the

DFSS programs that benefit from federal and state grant money. I am also familiar with the Chicago residents that benefit from DFSS services due to my job responsibilities which include supervision of grant development staff members that are responsible for needs assessments, preparing funder-required reports on service usage, and working with delegate agencies to deliver human service programming. Based on this personal knowledge from overseeing the development of these funding streams and working in this field for years, I am aware that the formula-driven grants that DFSS receives are vital and instrumental in providing direct and contracted services to hundreds of community organizations that provide a wide-range of services to all Chicago residents, especially the most vulnerable, including immigrants as described in paragraphs 13, 14, 15-20 of my October 23 Affidavit.

6. Because my team and I prepare, develop, and submit the grants that DFSS receives, I have also relied on publicly available materials regarding this funding. It is my understanding, based on knowledge I have obtained as part of my job, that information gathered during the decennial census is used by federal funding agencies to determine funding levels to states and cities, and that these federally-originated grants support communities based on the total population count and poverty, income, sex, and race/ethnicity data from the decennial census as set forth in paragraph 6 of my October 23 Affidavit. This knowledge, combined with my understanding of how these funds are used on the ground, means that I am aware of how funding cuts would impact Chicagoans as set forth in my October 23 Affidavit.

6. For example, in my role managing the grants that DFSS receives, I know that the City of Chicago has been designated as an Area Agency on Aging. This information is also publicly available on the State of Illinois, Illinois Department on Aging website and on the DFSS website, located at https://www2.illinois.gov/aging/PartnersProviders/Pages/aaa_list.aspx#aaa12;

<https://www.cityofchicago.org/city/en/depts/fss/provdrs/senior.html>;

<https://www2.illinois.gov/aging/Resources/Documents/StatePlanOnAging.pdf>. The amount of money the City of Chicago receives through the Area Plan on Aging grants are based on “a formula which takes into consideration the number of older citizens and elderly minorities in the area, as well as the number of seniors living in poverty, in rural areas, and alone” as set forth in paragraph 13 of my October 23 Affidavit. Details about this formula are also available in public records that are maintained by the State of Illinois on publicly-available websites.

7. Based on my experience with serving low-income, minority and elderly populations in the City of Chicago, I have personal knowledge that many of these populations are extremely vulnerable and are from some of Chicago’s poorest neighborhoods as set forth in my October 23 Affidavit.

8. In addition, during the State of Illinois Fiscal Year 2016 (July 1, 2016 – June 30, 2017), staff that I manage, who are responsible for the grant oversight of CSBG, conducted budget impact analyses on how the lack of access to both federal and state funds would impact DFSS, and the programs that it oversees, as a result of State of Illinois budget concerns.

9. Based on my position within DFSS, I am familiar with the DFSS services that receive funding from these grants and the help these services provide to City of Chicago residents. In particular, as part of my job, I work with the management and fiscal staff responsible for the program management and operations of the 6 DFSS Community Service Centers (“CSCs”) and the 21 Senior Centers (6 Regional and 15 Satellite). The DFSS CSCs provide through the Community Services Block Grant assistance to individuals and families in need to access a wide range of resources, from shelter, food, and clothing to domestic violence assistance, drug rehabilitation, job training, and prison re-entry services. The senior centers

through the Area Plan on Aging grants provide access to social, economic, and educational resources that enhance the quality of the lives of seniors including, among many things, a variety of life enrichment activities, computer learning classes, internet access, fitness programming, congregate dining, and access to programs that provide caregiver services, as described in paragraph 18 of my October 23 Affidavit. I am likewise familiar with how a reduction in funding would harm Chicagoans as described in paragraphs 14, 15, and 17-20 of my October 23 Affidavit.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: November 3, 2018


Jacqueline Tiema-Massie